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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AGAS COMPANY L.P.,

FRED SCHWARTZ, individually, as a joint tenant,
and as general partner of Agas Company L.P.,

ALLYNE SCHWARTZ, individually and as a joint
tenant,

ANN J. SCHWARTZ KLUGER, as general partner of

Adv. Pro. No. 10-04431 (SMB)

Agas Company L.P.,

STEVEN SCHWARTZ, as limited partner of Agas
Company L.P.,

AMY MADLYN SCHWARTZ, as limited partner of
Agas Company L.P., and

GARY PAUL SCHWARTZ, as limited partner of
Agas Company L.P.,

Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: April 30, 2014
2. Fact Discovery shall be completed by: June 5, 2015¹
3. The Disclosure of Case-in-Chief Experts shall be due: October 14, 2015
4. The Disclosure of Rebuttal Experts shall be due: November 16, 2015
5. The Deadline for Completion of Expert Discovery shall be: February 15, 2016
6. The Deadline for Service of a Notice of Mediation Referral shall be: April 15, 2016
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: May 2, 2016
8. The Deadline for Conclusion of Mediation shall be: August 30, 2016

¹ Fact Discovery was completed on June 5, 2015 with the exception of third party discovery directed to JP Morgan Chase Bank, N.A., HSBC Bank USA, N.A., and Bank of America, N.A., which shall be completed on or before September 15, 2015.

Dated: New York, New York
July 16, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
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Securities LLC and for the Estate of Bernard
L. Madoff*